

REMARKS

Claims 1-3, 5-8, 10-13, and 15 are currently pending. In the non-final Office action mailed on March 2, 2005 ("the Office Action"), the Examiner made the following disposition:

- I.) Rejected claims 12, 13, and 15 under 35 U.S.C. §112, second paragraph.
- II.) Rejected claims 6-8, 10-13, and 15 under 35 U.S.C. §101.
- III.) Rejected claims 1, 2, 6, 7, 11 and 12 under 35 U.S.C. §102(e) as being allegedly anticipated by *Weber* (U.S. Patent No. 6,480,901).
- IV.) Rejected claims 3, 5, 8, 10, 13, and 15 under 35 U.S.C. §103(a) as being allegedly unpatentable over *Weber* in view of *Bandhauer* ("A zero generated code XPCconnect proposal").

Applicant addresses the Examiner's disposition as follows:

- I.) Rejection of claims 12, 13, and 15 under 35 U.S.C. §112, second paragraph:

Claim 12 has been canceled.

Claims 13, and 15 have each been amended to depend from claim 11.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

- II.) Rejection of claims 6-8, 10-13, and 15 under 35 U.S.C. §101:

Claims 6 and 11 have been amended as per the Examiner's request to overcome the rejection.

Claims 8, 10, 13, and 15 depend directly or indirectly from claim 6 or 11 and are therefore allowable for at least the same reason that claims 6 and 8 are allowable.

Claims 7 and 12 have been canceled.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

III.) Rejection of claims 1, 2, 6, 7, 11 and 12 under 35 U.S.C. §102(e) as being allegedly anticipated by *Weber* (U.S. Patent No. 6,480,901):

Applicant respectfully traverses the rejection.

Independent claims 1, 6, and 11 have each been amended to clarify that a proxy object is created. The method call is issued to the proxy object using a first protocol. The proxy object translates the method call from the first protocol to an intermediate protocol, and translates the method call from the intermediate protocol to a second protocol. The proxy object issues the method call to a method using the second protocol. (*See, e.g., Applicant's specification page 6, lines 18-24; Figure 1*).

This is clearly unlike *Weber*, which fails to disclose or even suggest creating a proxy object that translates a method call from a first protocol to a second protocol. *Weber* discusses creating a proxy object, however, *Weber's* proxy object is clearly unlike Applicant's claimed proxy object. Referring to *Weber's* Figure 8, *Weber* teaches a method for issuing remote procedure calls from a management station 802 to a storage controller 806. A management interface application 830 at the management station 802:

initiates a proxy object to represent the storage system's object graph on management station 802. That is, management interface application 820 [sic] stores a copy of the storage system's object graph on management station 802, so it can access and display the object graph when necessary. After retrieving the storage systems organization and configuration, management interface application 830 displays the storage system's configuration on a display screen.

(*Weber*, 17:30-37).

Thus, unlike Applicant's claimed proxy object, *Weber's* proxy object does not have method calls issued to it, does not translate a method call from a first protocol to an intermediate protocol, does not translates a method call from an intermediate protocol to a second protocol, and does not issue a method call to a method using a second protocol. Instead, *Weber's* proxy object merely represents a storage system's object graph. Therefore, for at least these reasons, *Weber* fails to disclose or even suggest Applicant's claims 1, 6, and 11.

Claims 2, 7, and 12 have been canceled.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

IV.) Rejection of claims 3, 5, 8, 10, 13, and 15 under 35 U.S.C. §103(a) as being allegedly unpatentable over *Weber* in view of *Bandhauer* ("A zero generated code XPConnect proposal"):

Applicant respectfully traverses the rejection.

Independent claims 1, 6, and 11 are allowable over *Weber* as discussed above. *Bandhauer* still fails to disclose or suggest Applicant's claimed proxy object. The Examiner argues that XPConnect is an intermediate protocol, however, Applicant disagrees. XPConnect is a technology that binds JavaScript types to XPCOM types. (See, e.g., *Creating Applications with Mozilla*, <http://books.mozdev.org/html/mozilla-chp-8.html> (O'Reilly & Assoc. 2002)). With XPConnect, an XPCOM object is called and instantiated from JavaScript. *Id.* For JavaScript to call and instantiate the XPCOM object, XPConnect provides a bridge to bind JavaScript types to XPCOM types. *Id.* In XPConnect, XPCOM interfaces and IDs are stored as global JavaScript objects and properties that can be manipulated. *Id.*

Therefore, *Bandhauer* fails to disclose or suggest creating a proxy object that converts a first protocol into an intermediate protocol and converts the intermediate protocol into a second protocol. Instead, *Bandhauer* discusses XPConnect, which binds JavaScript types to XPCOM types. Accordingly, *Weber* in view of *Bandhauer* still fails to disclose or suggest claims 1, 6, and 11.

Claims 3, 5, 8, 10, 13, and 15 depend directly or indirectly from claim 1, 6, or 11 and are therefore allowable for at least the same reasons that claims 1, 6, and 11 are allowable.

Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

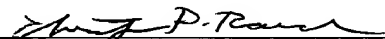
Response to March 2, 2005 Office Action
Application No. 09/865,660
Page 8

Conclusion

In view of the above amendments and remarks, Applicant submits that claim 1, 3, 5, 8, 10, 11, 13 and 15 are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

Dated: June 1, 2005

By: 
Christopher P. Rauch
Registration No. 45,034
SONNENSCHNEIN NATH & ROSENTHAL LLP
P.O. Box 061080
Wacker Drive Station, Sears Tower
Chicago, Illinois 60606-1080
(312) 876-8000